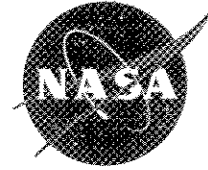


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 7, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Grant Thornton "Washington Women Speak!" breakfast on March 10, 2011

On March 10, 2011, Grant Thornton will host a breakfast and panel discussion at the Women's War Memorial at Arlington National Cemetery from 8 AM – 10:30 AM. The panel will feature prominent women leaders in the public and private sector in the Washington, D.C. area. The topic of the discussion will be "Building your Leadership Brand."

The event will be attended by representatives of the government consulting industry, NASA, and other Federal agencies. Over 150 people are expected to attend. The estimated cost of the refreshments, which includes all food and beverages, is \$18.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests. Moreover, NASA employees whose duties do not substantially affect the host, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone